

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Ronald L. Riggins	:	Case No.: 18-18286(JKF)
Debtor(s)	:	Chapter 13

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, Ronald L. Riggins, by and through his undersigned counsel, hereby move to modify his Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about December 18, 2018.
2. The Chapter 13 filing was assigned case number 18-18286(JKF).
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about August 21, 2019.
4. Debtor's income has been dramatically cut as he is no longer eligible to receive overtime.
5. These reductions in income have resulted in the Debtor falling behind on his Chapter 13 Plan payments.
6. Pursuant to the recently enacted CARES Act, Debtor has experienced a material financial hardship, directly or indirectly caused by the COVID-19 virus.
7. Debtor's Plan was originally Confirmed prior to March 27, 2020.
8. In light of this, and to avoid dismissal of his case, Debtor is humbly requesting that he be allowed to modify and extend his Chapter 13 Plan to 7 years.
9. This Plan remains a pro-rata payback to the unsecured creditors. (See **proposed modified Plan marked as "Exhibit A"**).

10. Lastly, this Plan is feasible based on the Debtor's current income and expenses. (**See Amended Schedules I & J marked as "Exhibit B".**)

WHEREFORE, the Debtor requests that he be permitted to modify his Chapter 13 Plan for the above-stated reasons.

Dated: May 20, 2020

/s/Brad J. Sadek, Esq.
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